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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

:
: Chapter 11
:
: Case No. 19-23649 (RDD)
:
: (Jointly Administered)
:

**AD HOC COMMITTEE OF NAS CHILDREN’S MOTION FOR LEAVE TO EXCEED
THE PAGE LIMIT IN FILING THE REPLY TO THE UNITED STATES TRUSTEE’S
OBJECTION TO THE FEE SETTLEMENTS INCLUDED IN SIXTH AMENDED
JOINT CHAPTER 11 PLAN OF REORGANIZATION OF PURDUE PHARMA L.P.
AND ITS AFFILIATED DEBTORS**

The Ad Hoc Committee of NAS Children (the “**NAS Committee**”), through its counsel, Tarter Krinsky & Drogin LLP, respectfully submits this motion (the “**Motion**”) for leave to exceed the page limit in filing its reply (the “**Reply**”) to the *Objection of United States Trustee to Sixth Amended Joint Chapter 11 Plan of Purdue Pharma, L.P. and its Affiliated Debtors* (the

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors shall include their affiliates and other entities under their control. The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

“UST Objection”) [Docket No. 3256]. In support of the Motion, the NAS Committee respectfully states as follows:

MOTION

1. The NAS Committee files its Reply in support of the work it performed on behalf of the NAS Children (children born with the condition known as neonatal abstinence syndrome (**“NAS”**)) – present and future – over the last three years that led to the establishment of the NAS Monitoring Trust, compensation for NAS Children through the PI Trust, and its efforts to bring awareness of the plight of the NAS Children to the nation’s attention, both before and after the Petition Date.

2. The groundbreaking NAS Monitoring Trust is the first of its kind in the country. It is designed to provide grants to entities that provide services to those most in need – caretakers of children born with NAS who live in some of the most underserved areas of the United States. Specifically, grant recipients from the NAS Monitoring Trust must advance all or any of the following goals: (i) preparing children with a history of NAS to be ready to enter or to succeed in school; (ii) informing through evidence the standard of care for all NAS Children ages zero to six, with priority given to NAS Children ranging in age from three to six; and/or (iii) enhancing the mother-child dyad. See NAS Monitoring Trust Distribution Procedures (**“NAS Monitoring TDP”**) at Docket No. 3187, Exhibit B, p.8. Achieving this result took thousands of hours of fact-finding, education, and negotiation by the NAS Committee.

3. Notwithstanding the highly contested nature of the Chapter 11 Cases, only the United States Trustee filed an objection to the attorney fee provisions in the Plan, necessitating the filing of the Reply to the UST Objection.

4. The *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 [Docket No. 498] (the “**CMO**”), provides that “[u]nless granted prior permission...replies and statements are limited to 20 pages.” **CMO** at Ex. 1, ¶ 15.

5. The NAS Committee submits that allowing the Reply to exceed twenty pages is appropriate and justified. Due to the complexity of the Plan and issues raised in the UST Objection, the background section of the Reply is extensive as the NAS Committee describes the efforts it took to reach is groundbreaking results in the Plan. Consequently, the Reply exceeds the page limit restriction in the CMO.

6. The Reply is approximately 38 pages. The NAS Committee is unable to provide the Court with the information necessary for the full and fair adjudication of the issues raised in the UST Objection if it were to remain subject to the twenty-page limitation.

CONCLUSION

7. For the above reasons, the NAS Committee respectfully submits that this Bankruptcy Court grant the NAS Committee leave to file the Reply in excess of twenty pages.

Dated: August 5, 2021
New York, New York

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.²

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**ORDER GRANTING LEAVE TO EXCEED THE PAGE LIMIT IN FILING THE
REPLY TO THE UNITED STATES TRUSTEE’S OBJECTION TO THE FEE
SETTLEMENTS INCLUDED IN SIXTH AMENDED JOINT CHAPTER 11 PLAN OF
REORGANIZATION OF PURDUE PHARMA L.P. AND ITS AFFILIATED DEBTORS**

Upon the motion (the “**Motion**”),³ dated August 2, 2021, of the NAS Children Ad Hoc Committee (the “**NAS Committee**”), for an order granting leave to exceed the page limit in filing its *Reply to the Objection of United States Trustee to Sixth Amended Joint Chapter 11 Plan of Purdue Pharma, L.P. and its Affiliated Debtors* (the “**Reply**”); the Court finding that the NAS Committee has shown good cause based on the facts and circumstances set forth in the Motion and the Reply to exceed the page limit set forth in the CMO.

Based on this finding, IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.

² The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors shall include their affiliates and other entities under their control. The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

³ Capitalized terms used but not defined herein shall have the meaning given to such term in the Motion.

2. The NAS Committee may exceed the Bankruptcy Court and CMO's page limitation for replies and statements and file a Reply that is [34] pages in length.

Dated: White Plains, New York
_____, 2021

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE